

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

**SAMSUNG ELECTRONICS AMERICA,
INC. ,**

Plaintiff,

VS.

YANG KUN "MICHAEL" CHUNG,
THOMAS PORCARELLO,
YOON-CHUL "ALEX" JANG,
JIN-YOUNG SONG,
ALL PRO DISTRIBUTING, INC.,

Defendants.

CASE NO. 3:15-CV-04108-D

TELEPHONIC STATUS CONFERENCE

JULY 5, 2016

VOLUME I OF I

On the 5th day of July, 2016, a Telephonic Status Conference in the above-entitled and numbered cause came on to be heard before the **Honorable Sidney A. Fitzwater**, United States District Judge for the Northern District of Texas, presiding.

Proceedings reported by mechanical stenography; transcript produced by computer.

1	VOLUME I (PAGES 1 - 26)	
2		
3	PROCEEDINGS FOR JULY 5, 2016	
4		<u>PAGE</u>
5	CAPTION.....	1
6	INDEX.....	2
7	APPEARANCES.....	3
8	TELEPHONIC STATUS CONFERENCE.....	5
9	ROLL CALLED.....	5
10	COURT'S INTRODUCTION.....	7
11	MR. MOSCOWITZ'S ARGUMENT.....	8
12	MR. LOWENSTEIN'S ARGUMENT.....	15
13	COURT'S OBSERVATIONS.....	19
14	MR. MOSCOWITZ'S RESPONSE.....	21
15	MR. LOWENSTEIN'S RESPONSE.....	21
16	MR. ANSLEY'S RESPONSE.....	22
17	COURT'S RULING.....	22
18	MS. KELLOW'S ARGUMENT.....	23
19	MR. CHOE'S COMMENT.....	25
20	REPORTER'S CERTIFICATE.....	26

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TELEPHONIC STATUS CONFERENCE

JULY 5, 2016

(The following took place in chambers with all
below-named parties present via telephone.)

THE COURT: It's 5:15. This is Judge Fitzwater.
The Court at this time is conducting a Telephonic Status
Conference on the Motion to Compel of All Pro Distributing
that was filed on May 24, 2016.

I'm going to begin by calling the roll of the
attorneys who have indicated that they wish to participate in
the conference, and then I'm going to give some housekeeping
instructions that will help the court reporter.

Is Mr. Moscovitz on the line?

MR. MOSCOWITZ: Yes, Your Honor.

THE COURT: Ms. Walters?

MS. WALTERS: Yes, Your Honor.

THE COURT: Mr. Mitilian?

(No response.)

MR. MOSCOWITZ: Your Honor, this is Barry Moscovitz.
I don't believe Mr. Mitilian is going to attend. I know he
indicated he initially was going to, but I don't think he is
any longer.

MR. MITILIAN: Actually, Barry, this is --

MR. MOSCOWITZ: Oh.

MR. MITILIAN: -- Armen Mitilian on behalf of All

1 Pro, and I am on the line. I just dialed in.

2 MR. MOSCOWITZ: Okay. Thank you.

3 THE COURT: Mr. Ansley?

4 MR. ANSLEY: Yes, Your Honor.

5 THE COURT: Mr. Lowenstein?

6 MR. LOWENSTEIN: Yes, Your Honor.

7 THE COURT: Mr. Riemer?

8 MR. RIEMER: Yes, Your Honor.

9 THE COURT: Mr. Kelminson?

10 MR. KELMINSON: Yes, Your Honor.

11 THE COURT: Mr. DeVoss?

12 MS. WALTERS: Your Honor, this is Rachael Walters.

13 Mr. DeVoss just sent me an e-mail stating that he would not
14 participate in the hearing based on your statement that only
15 the parties who need to participate are those involved in the
16 Motion to Compel.

17 THE COURT: Thank you. Mr. Choe?

18 MR. CHOE: Yes, Your Honor.

19 THE COURT: Ms. Kellow?

20 MS. KELLOW: Yes, Your Honor.

21 THE COURT: Mr. Chung?

22 MR. CHUNG: Yes, Your Honor.

23 THE COURT: The court reporter will be assisted in
24 making her record if Counsel will identify themselves before
25 they speak.

1 If we get down to the point where it's largely two
2 attorneys addressing the Court, then you won't need to do that
3 anymore because she can differentiate between you, but until
4 that's clear, I'll ask that you identify yourself so that the
5 record will be accurate.

6 Let me begin by stating that the purpose of this
7 status conference is to attempt to resolve, to the extent
8 possible, the Motion to Compel. Since the Amended Rules of
9 Civil Procedure were adopted on December 1, courts have been
10 attempting to reduce delay and expense involved with
11 litigation, particularly in the area of discovery, where
12 possible. There are instances where this cannot be done, and
13 the Court needs to refer the motion to the Magistrate Judge.
14 There are instances where a hearing or fuller briefing is
15 required, but in those instances where it appears possible to
16 the Court that some form of prompt conference and working with
17 Counsel will enable the Court to resolve a discovery dispute,
18 it's going to endeavor to do that.

19 And so, in this case, after reviewing the Motion to
20 Compel and the short letter response that I permitted to the
21 motion, I thought it possible that, by conducting this sort of
22 informal telephonic conference, it would be possible to get
23 this matter resolved, reducing the expenses to the parties and
24 getting on with the litigation. So that is by way of
25 background.

1 Because the last update that I have under my
2 protocol is for Mr. Ansley, I'm going to begin by calling on
3 Mr. Moscovitz to advise the Court of where he sees this matter
4 standing, and then we'll -- the Court will hear from Counsel
5 further.

6 So, Mr. Moscovitz, you may proceed if you like.

7 **MR. MOSCOWITZ:** Thank you, Your Honor. And we
8 certainly appreciate you conducting this status conference and
9 are hopeful that, at the conclusion of the status conference,
10 we may be on a path towards resolution as to -- as opposed to
11 a more expensive and time-consuming alternative through an
12 actual hearing and perhaps some additional briefing.

13 And here's where we see it, and I'd like to start
14 with sort of the big picture, and then we can drill down as
15 the Court requires. Our primary focus is in -- and what we
16 relied upon in the Motion to Compel has to -- is on the *Heller*
17 case. And I think in part what *Heller* stood for was the
18 parties aren't supposed to play games anymore with discovery.

19 And, unfortunately, it is our belief that, even
20 though Samsung has amended some of their responses and they
21 have produced some additional documents from when we filed our
22 Motion to Compel, we still are lacking the fundamental answers
23 that require -- that we believe Samsung is required to provide
24 and the fundamental documents that we also believe they're
25 required to provide. For example, we have asked in many of

1 our requests for production that we be given the documents
2 that support the various claims that they have made. To date,
3 we have no documents, none, that are supportive of their
4 claims.

5 We have lifted -- we have said -- we have requests
6 for production that are lifted straight from their complaint,
7 and we have nothing in response from Samsung regarding those
8 factual allegations that they make.

9 I want to point the Court to just a few quick
10 examples so Your Honor can get a sense of what we're dealing
11 with.

12 In Samsung's Amended Objections and Responses to
13 Defendant All Pro's First Request For Production, we asked for
14 all communications involving Song, who is one of the
15 Defendants, and All Pro regarding the Samsung auction
16 process --

17 **(Feedback on phone line.)**

18 **MR. MOSCOWITZ:** -- from the date the auction
19 process --

20 **COURT REPORTER:** Excuse me.

21 **MR. MOSCOWITZ:** -- was implemented --

22 **COURT REPORTER:** Excuse me, excuse me.

23 **THE COURT:** Mr. Moscowitz, let me get you to stop
24 and start over. We got some feedback on the call. I don't
25 know why.

1 MR. MOSCOWITZ: Oh, okay.

2 THE COURT: Could you --

3 (Court reporter read back Page 8, Lines 13-15.)

4 THE COURT: And that's where we lost you.

5 MR. MOSCOWITZ: Okay. Regarding the Samsung auction
6 process from the date the auction process was implemented by
7 Samsung to current.

8 And the response that we received basically said,
9 "We're not going to be looking for any documents."

10 If we go to the answer for Request For Production
11 No. 30, where we ask for all communications between All Pro
12 and the employee defendants for the period of time that
13 Plaintiff alleges the improper acts made the basis of this
14 suit occurred, we received --

15 (Phone ringing, cuts out voice.)

16 MR. MOSCOWITZ: -- objections, and then we were
17 promised we would have documents by June 17th that were
18 responsive, and we got no documents that are responsive.

19 What we have also received, Your Honor --

20 UNIDENTIFIED CALLER: Hello, hello.

21 MR. MOSCOWITZ: Yes, hello.

22 UNIDENTIFIED CALLER: This is Bell Nunnally &
23 Martin, the receptionist's desk. Can I help you?

24 THE COURT: I don't think the call was intended for
25 you. Something must have happened with our conference call,

1 if you'd like to hang up.

2 **UNIDENTIFIED CALLER:** All right.

3 **MR. MOSCOWITZ:** Judge, we have asked for documents
4 that support the basis of their claims.

5 And what we have received in response are threefold.
6 One is not a single document. Number two, an assertion that
7 requests for documents asking them to support their claims
8 call for legal conclusions, and they have said that they're
9 privileged. We don't have a proper privilege log. And so,
10 Your Honor, we could -- we could honestly go on and on through
11 these requests.

12 I think what the Court should know is what Samsung
13 has done thus far is, they have continually represented
14 through their responses to discovery that they're going to be
15 getting us documents by specific dates on a rolling
16 production.

17 Number one, we believe that that's improper, but,
18 number two --

19 **(Phone feedback and garbled voices in background.)**

20 **MR. MOSCOWITZ:** -- we still don't have the
21 documents. So when they say they're going to give us
22 documents on a particular date, they give us a couple of
23 documents that have nothing to do with the issues raised in
24 our Motion to Compel. So it's --

25 **MR. LOWENSTEIN:** Your Honor and Mr. Moscowitz --

1 **MR. MOSCOWITZ:** -- our hope that any suggestions
2 that the Court may have, but this discovery process has gone
3 on, you know, for quite some time with very little progress
4 from our perspective.

5 **MR. LOWENSTEIN:** Your Honor, this is Jeff
6 Lowenstein. I apologize for interrupting, but we somehow got
7 dropped off the call about four minutes ago, so I think we
8 missed -- after the comments about the communications between
9 Song and All Pro, we got dropped off. So I hate to ask Mr.
10 Moscowitz to do it one more time, but is there any way we
11 could have Mr. Moscovitz just repeat what came after that.

12 **THE COURT:** This is Judge Fitzwater. You may. He
13 gave some examples, and I think he can give those examples
14 again.

15 **MR. LOWENSTEIN:** Sure.

16 **THE COURT:** And you will pick up on it, Mr. Ansley
17 [sic]. So go ahead, Mr. Moscovitz.

18 **MR. MOSCOWITZ:** Thank you, Your Honor. One of the
19 examples that we gave would be Samsung's response to Request
20 For Production No. 18, where we ask for communications between
21 the Defendant Song and All Pro regarding the Samsung auction
22 process. All we received are objections. And in the end,
23 Samsung's response is, "We're just not going to look for it
24 because it's too voluminous or it would be too burdensome."

25 With respect to Request For Production 30, we ask

1 for communication between All Pro and the employee defendants
2 for a period of time that Plaintiff alleges the improper acts
3 made the basis of this suit occurred. We got nearly a page of
4 objections, and then at the very end, Samsung indicated that
5 they would be producing documents responsive to this request
6 on June 17th and on a rolling basis thereafter. And to date,
7 we have not received any documents that are responsive to this
8 request.

9 We have asked for numerous requests for production
10 related to Samsung's damages that they claim they incurred.
11 The only response that we've ever received is, "We'll
12 supplement." And that's it, not a single page, not a single
13 bit of information.

14 We have asked for documents to support their claims
15 and causes of action. And, Your Honor, one of the things and
16 primary things that Samsung has alleged is that my client, All
17 Pro, engaged in bribes and kickbacks and sold counterfeit
18 phones, interfered with the codefendant employees' contracts,
19 and we have asked for very specific documents to support those
20 causes of action. And we have received zero, not a single
21 one.

22 We have -- we have also asked -- in connection with
23 documents, you know, the documents to support their
24 allegations, Samsung has argued in their -- in their responses
25 to the requests for production through their objections that,

1 when we ask for documents to support a cause of action, that
2 that actually calls for a legal conclusion. Alternatively,
3 they have argued that the documents that support their various
4 causes of action are privileged. And we have never received a
5 privilege log. Nothing.

6 And our position has been, and continues to be, and
7 was raised with Mr. Riemer and his associate at the meeting
8 that we had, that if it is Samsung's contention that certain
9 things that support their claims, such as the interviews that
10 we know that took place of the various Defendants, not All
11 Pro, but the other Defendants, if they're contending that
12 those interviews are privileged, then they can't use those
13 interviews. They can't use any information obtained in those
14 interviews.

15 And so just to kind of wrap it up, what we -- we're
16 open to any and all suggestions. And, like I said at the
17 onset, we appreciate the Court taking the time to do this and
18 to deal with this issue, but their amended responses have
19 changed nothing with respect to our Motion to Compel except
20 like six or seven where Samsung produced the contracts between
21 Samsung and All Pro, documents that we already have.

22 And, literally, Your Honor, without exaggerating, we
23 could go through all of these, you know, and there are
24 instances where we have produced 1,000 pages of correspondence
25 between us and Samsung, and when Samsung has been asked for

1 the identical type of information, they give us one or two
2 pages, and that just doesn't make sense. We have documents
3 between us and various employees with Samsung that we
4 produced, and we would expect at the very least to get those
5 documents back in response to our requests for production, but
6 have not.

7 So, Your Honor, like I said, we're more than willing
8 to listen and work with Mr. Ansley and his team, but from our
9 perspective, very little, if any, progress has been made on
10 this issue since we filed our motion.

11 **THE COURT:** All right. Thank you, Mr. Moscovitz.
12 At this time, I'll hear from Samsung.

13 **MR. LOWENSTEIN:** Your Honor, this is Jeff
14 Lowenstein. I'm going to take the lead. I'm responding for
15 Samsung.

16 The intent and attempt -- and, again, we also
17 appreciate your time. I know you're busy and taking up your
18 evening for us, so we appreciate that. And our goal is to try
19 to resolve these types of issues.

20 Are you getting the same feedback on me that --

21 **THE COURT:** Yes, we just started getting some
22 feedback.

23 **MR. LOWENSTEIN:** I'll talk slowly to try to minimize
24 that.

25 **MR. MOSCOWITZ:** I can hear you, but it's rough.

1 **COURT REPORTER:** Me too. I'm the court reporter.

2 **MR. LOWENSTEIN:** Is there somebody participating by
3 cellphone or something that's causing this?

4 **THE COURT:** I don't know. This is Judge Fitzwater.
5 That was a little better just then.

6 **MR. LOWENSTEIN:** Okay. I'll keep trying. So the
7 approach that we outlined in our response, our brief response,
8 which was consistent with what we kind of see All Pro doing in
9 response to our discovery, is that there are many moving parts
10 to this case. There's a considerable amount of discovery.
11 It's a case involving fraud and stealing from a company that
12 was obviously done with the intent of not letting the company
13 figure it out. Much of what was uncovered was through an
14 internal investigation, and we are in the process of
15 collecting and going through and sorting out privileged from
16 not privileged and work product from not work product and
17 producing it as we can.

18 The statements that nothing substantively relating
19 to our claims has been provided is just not true. The primary
20 issue that All Pro is involved with — and the Court may or
21 may not be familiar with the details there — was that All Pro
22 was involved with the conspiracy with some of the employees
23 and other vendors in obtaining Samsung phones or parts through
24 an auction process that was rigged to benefit All Pro, where
25 All Pro was leaked information and then was allowed to get

1 into this auction process with an upper hand on other vendors
2 to undermine Samsung's ability to maximize its return on those
3 auctions.

4 We have produced bidding information relating to
5 those auctions. We have produced information relating to the
6 thresholds set by the internal employees in order to ensure
7 that All Pro was one of the few that got to participate in the
8 auctions. We've produced internal records relating to the
9 auctions that the employees compiled. So there has been
10 information that relates to the claims asserted against All
11 Pro.

12 There are also a substantial amount of e-mails from
13 the e-mails that were compiled by these people. That is
14 something that's going to take a process to go through because
15 they've asked for years and years and years of e-mails that
16 are probably in the hundreds of gigabytes, if not more, of
17 data to go through, and that's going to cost a substantial
18 amount of money and time for Samsung to go through.

19 Again, as I pointed out, this is an ongoing process
20 where we're continuing to do the work. We produced what we
21 can so far and are working very hard and have many people
22 working on it on Samsung's dime to pull together the
23 information.

24 There may be a time, Your Honor, when we have
25 information we come across that we're going to have to fight

1 about, and we are going to provide a privilege log, and it's
2 going to outline the things that we think are privileged or
3 work product, and there may be a dispute over that.

4 There may come a time where we say we've exhausted
5 our resources and don't have anything else to produce, and
6 we're not going to produce anything else. We haven't said
7 that yet about anything from what I know. At which point, we
8 may have a fight about that as well.

9 But the reason that we framed our letter brief the
10 way we did was to say, we're not there yet. I mean, this is a
11 lot of information. This case is in its early stages. We're
12 a long time off from, you know, expert deadlines and other
13 things like that, and there's time for us to do this right.

14 I think All Pro, in going through its information,
15 has kind of taken the same approach and said, "Either our --
16 we're having an ongoing production and we're going to get you
17 information," or, in some instances, said, "Refer to your own
18 documents, Samsung; we're not going to give you ours," which
19 we haven't really chewed up that issue yet, but I think both
20 parties are experiencing the concept of, when you've got a lot
21 of information and a lot of years to deal with, you have to go
22 through it and get to it.

23 And so I don't want to nitpick on the examples that
24 Mr. Moscowitz gave, but, for example, where he said in
25 response to RP -- Request For Production 18 that we said we're

1 not giving them anything or not going to do the search, that's
2 not what the response says. There's a whole lot more words
3 than that in the amended response, and we've provided them a
4 whole lot more explanation than "We're not going to do any
5 work."

6 We're doing lots of work. We're going to go through
7 a lot of e-mails and try to figure out a way, and hopefully
8 work with Mr. Moscowitz on search terms for that, but go
9 through a process to get them what they want. And if they
10 determine after going through that that we didn't do it or
11 we're refusing to produce things they're entitled to, then we
12 might be back to the Court, but I hope that's not the case.

13 I just think that this is greatly premature.
14 Samsung is not playing games. Samsung is a large
15 international company. This is highly sensitive information
16 where they were defrauded and stolen from by vendors and
17 employees. They're very sensitive about this information, so
18 they want us to go through this process in a way where we're
19 not just dumping information out there that competitors and
20 employees that stole from them can just have it.

21 But we also, of course, want to pull together all
22 the information that supports our claims, because, obviously,
23 that's what we need to do to support our claims.

24 **THE COURT:** This is Judge Fitzwater. Let me make a
25 couple of observations and then give Counsel an opportunity to

1 be heard further.

2 It seems to me, from listening to Counsel and
3 reading the submissions, that we need firm deadlines for the
4 disclosure of discovery that is un -- where the scope and the
5 details are uncontested. Depositions cannot begin if Counsel
6 are concerned that they'll have to retake a key deposition.

7 And then we need a process in place to resolve those
8 issues for matters that are contested and firm deadlines for
9 doing that.

10 An example of a firm deadline for discovery that's
11 uncontested would be something where All Pro is asking Samsung
12 to disclose documents that support allegations of the
13 complaint. This is not a case where Samsung is the Defendant
14 and saying, "We are surprised that we were sued; we haven't
15 been working on our documents."

16 This is a case where Samsung is the Plaintiff. It
17 strikes me that Samsung, even with issues of Korean
18 translations and issues of privilege and so forth, ought to
19 know before it ever filed the suit the documents that it
20 believes support its claims.

21 So I would like to get Counsel's views about getting
22 Counsel to give us -- to work on firm deadlines where the
23 discovery requests are not subject to dispute and then a
24 process for resolving those that are, again, with the idea
25 that we're trying to do this as efficiently and as quickly as

1 possible, so that we don't end up with a lot of unnecessary
2 cost and delay.

3 Mr. Moscovitz?

4 **MR. MOSCOWITZ:** Judge, as far as the process that
5 you've outlined, we would be agreeable to working with Mr.
6 Ansley and the other attorneys at Bell Nunnally regarding
7 that.

8 We believe that the -- you know, that there should
9 be documents that they -- that should not be contested, and
10 we'd be happy to try and work with them on a firm deadline to
11 provide those documents.

12 And then as to the second category of requests, for
13 those for which there is just no working it out, getting the
14 matter set for a hearing with either Your Honor or your
15 Magistrate Judge, and we would be more than agreeable to do
16 that.

17 **THE COURT:** Mr. Ansley?

18 **MR. LOWENSTEIN:** This is Mr. Lowenstein. That
19 process --

20 **THE COURT:** I'm sorry, yes.

21 **MR. LOWENSTEIN:** The process sounds -- Mr. Ansley is
22 dying to talk, but I'm going to keep talking over him.

23 **(Laughter.)**

24 **MR. LOWENSTEIN:** I think that process makes sense,
25 Your Honor.

1 **THE COURT:** All right. And did Mr. Ansley want to
2 be heard at this time?

3 **MR. ANSLEY:** Thank you, Your Honor. This is Jeff
4 Ansley. I do agree with what Mr. Lowenstein just said. That
5 process, as outlined by Mr. Moscovitz, does make sense. It's
6 just a matter, Your Honor, I believe of identifying the timing
7 in which we would be producing documents as the Court
8 identified to support our claims.

9 **MR. LOWENSTEIN:** And the other undisputed --

10 **COURT REPORTER:** Who was that and what did you say?

11 **MR. LOWENSTEIN:** This is Mr. Lowenstein. The ones
12 that support our claims and on the areas where there's no
13 dispute as to production, which I think is what the Court
14 outlined.

15 **THE COURT:** Would you be in a position to report
16 back to the Court seven days from now, next Tuesday, by
17 something in writing. It could be a letter that would outline
18 how you're going to approach these categories and dates?

19 Mr. Moscovitz?

20 **MR. MOSCOWITZ:** Yes, Your Honor, we would.

21 **THE COURT:** Mr. Lowenstein?

22 **MR. LOWENSTEIN:** Yes, Your Honor, we would.

23 **THE COURT:** All right. Then what I'm going to do
24 is, I'm going to continue to defer any briefing on this
25 motion, and I'll hear back from you through some letter or

1 alternative written filing that's due by 5:00 p.m. next
2 Tuesday where you outline what I've identified. And if you
3 need to consult the record, the court reporter is available to
4 produce that for you.

5 Now, let me ask if any other attorney who's
6 participating, or we have a pro se party as well, wishes to be
7 heard before we conclude the call.

8 **MS. KELLOW:** Your Honor, this is Elizabeth Kellow,
9 Counsel for Jin-Young Song, one of the employee defendants,
10 whose name actually has come up once or twice in this
11 argument.

12 We also have been -- and I'm getting some feedback.
13 Are you as well?

14 **THE COURT:** I am, but if you speak slowly, the court
15 reporter can still follow you.

16 **MS. KELLOW:** I will speak slowly. We are also
17 having some discovery issues as well with Plaintiff Samsung on
18 our document requests that we raised back at -- it would have
19 become effective at our 26(a) conference back in March.

20 Luckily, in light of the Court's requirement for the
21 meet and confer, which I very much appreciate, Mr. Ansley, Mr.
22 Riemer and I met in person in my offices last Wednesday to go
23 through each and every one of the issues that has been a
24 problem to date. And, by problem, I mean similar problems to
25 what Mr. Moscowitz described about lack of production, lack of

1 a date certain by which production would be made, and/or
2 standing on objections to requests for what facially and I
3 would say in actuality are clearly relevant documents.

4 I believe we had a very productive meeting last
5 Wednesday with Mr. Ansley and Mr. Riemer, and it is my hope
6 that we will be able to work through these issues, along the
7 same lines you have outlined and suggested for Samsung's
8 attorneys and All Pro's attorneys. However, we had an e-mail
9 exchange this afternoon that indicates, if we don't work
10 through those, we will have further problems. I expect we
11 will be able to work through those, particularly with the
12 Court's observations, which I find most helpful this
13 afternoon.

14 So, in short, we are having some difficulties as
15 well. I don't think Samsung would disagree with that, but I
16 also believe we have a hope — and I think it's a mutual hope
17 — that we will be able to work through ours without having to
18 bother the Court further, particularly if we walk kind of in
19 lockstep with All Pro and Samsung on their respective
20 discovery disputes.

21 **THE COURT:** Thank you, Ms. Kellow. This is Judge
22 Fitzwater.

23 Mr. Ansley or Mr. Riemer, do you wish to be heard,
24 or Mr. Lowenstein, in response?

25 **MR. LOWENSTEIN:** This is Mr. Lowenstein. The sole

1 correction, just for the record's sake, is that it was Mr.
2 Riemer and I that were present at the meeting, not Mr. Ansley.
3 Other than that, we are hopeful that we can work out things
4 with Ms. Kellow as well along the same lines, and I think we
5 did have a productive meeting with her and gotten a long way
6 on resolving the issues that she had raised.

7 MS. KELLOW: I do apologize, Mr. Lowenstein.

8 MR. LOWENSTEIN: It's all right.

9 THE COURT: All right. This is Judge Fitzwater.
10 Anyone else who wishes to be heard before we conclude the
11 conference?

12 (No response.)

13 THE COURT: All right. Thank you all.

14 MR. CHOE: (Garbled.) This is --

15 THE COURT: I'm sorry, did someone wish to be heard?

16 MR. CHOE: Yeah. This is Jason Choe, and I'm the
17 attorney for Yoon-Chul "Alex" Jang, and there's nothing that
18 we would like to add at this time.

19 THE COURT: All right. Thank you. I'm going to
20 hang up at this time. I'm not sure if that will keep the rest
21 of y'all from conferring if you need to, but I'm going to hang
22 up.

23 And, as I say, there will be a docket entry
24 reflecting this, and the court reporter has made a record of
25 the hearing or the conference. All right. Thank you,

1 Counsel.

2 MS. KELLOW: Thank you, Your Honor.

3 MR. MOSCOWITZ: Thank you, Your Honor.

4 MR. LOWENSTEIN: Thank you, Your Honor.

5 THE COURT: Thank you very much. Goodbye.

6 (End of Telephone Conference for 07/05/2016.)

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11 I certify that the foregoing is a correct transcript from
12 the record of proceedings in the above-entitled matter. I
13 further certify that the transcript fees format comply with
14 those prescribed by the Court and the Judicial Conference of
15 the United States.

16
17 s/Stacy Mayes Morrison
18 Stacy Mayes Morrison
Official Court Reporter

7/8/2016
Date

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Stacy Mayes Morrison
Official Court Reporter